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18 Jun 1996

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering  
Command  
To: Distribution

Subj: MONTHLY PROGRESS REPORT FOR MAY 1996 ENGINEERING FIELD  
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS  
POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) May 1996 Monthly Progress Report (MPR)

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2. If you have any questions, please contact the undersigned at (415) 244-2655.

~~Original~~ ~~Signature~~ by:

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By direction of  
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RAB Member: San Francisco Dept. of Public Works (Attn: Mr. Samuel Murray)

RAB Member: SEED (Attn: Sy-Allen Browning)

RAB Member: ARC Ecology (Attn: Mr. Saul Bloom)

RAB Member: Law Offices of Leslie R. Katz (Ms. Leslie Katz)

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**INSTALLATION RESTORATION PROGRAM  
MONTHLY PROGRESS REPORT**

**MAY 1996**

**NAVAL FACILITIES ENGINEERING COMMAND  
HUNTERS POINT SHIPYARD\***

**1. PROGRESS DURING THE REPORT PERIOD**

The activities described below were completed during the current report period. Those activities described as complete in the previous monthly progress report have been omitted for the sake of brevity. The facility status is as follows:

- **Field Work:** Remedial investigation fieldwork has been completed for Parcels B and C with the exception of (1) surveying of borings and monitoring wells in Parcel C which is awaiting completion of all of the fieldwork, and (2) potential step-out borings/wells in Parcel C, which will be selected depending on the analytical results from recently completed borings.

The field work in Parcels D and E continued. Most of the remedial investigation fieldwork has been completed for Parcels D and E. Those monitoring wells that have only two rounds of groundwater samples collected will require one final sampling round in June. Surface soil samples were collected at each of the three previously identified burn areas in Parcel E. Four additional monitoring wells have been proposed to be installed on City of San Francisco property immediately adjacent to the Parcel E boundary. These wells will help define the groundwater gradient for the industrial landfill site (IR-01). Well installation is expected to occur in June 1996.

The draft final field sampling plan for the proposed activities at the three formerly used defense sites (FUDS) in Parcel E was completed and submitted to the agencies for review during the month of May. The FUDS soil sampling and monitoring well installation should be completed during June. The third round of groundwater sampling from these new FUDS wells is not expected to be conducted until October 1996.

Indoor air sampling in Parcels B, C, and D has been completed. Limited outdoor air sampling has been proposed in the report to address remaining data gaps.

- **Parcel A:** The preparation of environmental documentation for transferring Parcel A from the Navy to the City of San Francisco continues on schedule. The next step in the transfer process consists of the preparation of the Environmental Baseline Survey (EBS) and Finding of Suitability to Transfer (FOST) documentation, along with the preparation of the Environmental Impact Statement/Report (EIS/EIR). A scoping meeting in March for the preparation of the Parcel A EBS/FOST documentation determined that a Parcel A-Specific EBS was not necessary. The Draft Parcel A FOST is due to the agencies for review in early June.

Clean out of the **Parcel A** storm drains has been completed. The analytical results have been evaluated, and the Parcel A Storm Water Monitoring Report was distributed to the regulatory agencies for information on May 10, 1996.

The final item concerning **Parcel A** consists of the preparation of a Notice of Well Abandonment of those monitoring wells installed during the RI. The Navy prepared the Notice of Well Abandonment for **Parcel A** and obtained concurrence to proceed from EPA, DTSC, RWQCB, and the City of San Francisco. During the month of April, the Navy implemented the abandonment of six monitoring wells in **Parcel A**. A formal letter documenting the details of the well abandonment will be issued for the administrative record in July.

- **RI Reports:** The preparation of the Draft Final Parcel B Remedial Investigation (RI) Report continued during the month of May. The Draft Final Parcel B RI Report was originally scheduled for submittal on May 1, 1996. However, in order to incorporate revised information and respond to comments, the date of delivery of the draft final document to the regulatory agencies was extended to June 3, 1996 with concurrence of the agencies. Progress is ongoing in the preparation of the **Parcel C, D, and E** RI reports. The Draft Parcel D RI Report is due to the agencies for review on June 28, 1996.
- **FS Reports:** The preparation of the Draft Parcel B Feasibility Study (FS) Report continued during the month of May. The Draft Parcel B FS Report was originally due to the agencies for review on May 1, 1996. The Federal Facility Agreement (FFA) FS report submittal date was delayed 30 days to June 3, 1996 with concurrence of the agencies in order to incorporate information from the delayed Draft Final Parcel B RI Report. However, to keep the parcel on schedule, the agreed upon FFA delivery date for the Draft Final Parcel B FS Report remains August 1.
- **Air Monitoring:** The Navy submitted the Draft Final Phase II Air Monitoring Report to the agencies on May 29, 1996. Included with the responses to comments was a proposed work plan for building-specific air sampling locations to complete the RI fieldwork.
- **Removal Actions:**

Pickling and Plate Yard (IR-9): This removal action was completed by the Navy Public Works Center San Francisco Bay (Public Works). The Navy has started the preparation of the Draft Construction Summary Report and expects to submit this report in July 1996.

Exploratory Excavations: The preparation of documentation is being performed by PRC Environmental Management Inc. (PRC). PRC submitted the Draft Exploratory Excavation Action Memorandum for Navy and agency review on May 21, 1996. This document included a modification to the Draft Final Exploratory Excavation Engineering Evaluation/Cost Analysis (EE/CA) to specify off-site disposal of all excavated material as the preferred alternative.

The public comment period for the Draft Final Exploratory Excavation EE/CA ran from March 18 through April 16, 1996. On April 16, the Navy received comments from Ms. Amy Brownell (City and County of San Francisco). These were the only comments

received. A responsiveness summary has been prepared and incorporated into the Action Memorandum. The Navy expects to start work on this removal in July or August of 1996.

Groundwater Plumes: The preparation of documentation is being done by PRC. During the February 7, 1996 meeting, the BCT agreed to pursue the Parcel E groundwater removal action and stop work on the Parcels B and C groundwater plume EE/CAs. Work performed in preparing the Parcels B and C groundwater plume EE/CAs will be folded into the Parcels B and C Feasibility Study. PRC submitted the Draft Final IR 1/21 Groundwater EE/CA (Parcel E EE/CA) on May 28, 1996.

A revised version of the implementation work plan (IWP) has been completed and is undergoing an internal review. The IWP, which will be used by the remedial action contractor (RAC), IT Corporation, is divided into two phases. Phase 1 is written in the form of a statement of work and it will cover the preliminary tasks such as surveying and cone penetrometer testing to investigate subsurface conditions along the proposed alignment of the sheet pile wall. Phase 2 is an abbreviated performance specifications and it will cover the remainder of the work. The Navy expects to start work on this removal in the late summer to early fall of 1996.

Removal of Contaminated Soils and Floating Product at IR-3: The preparation of documentation is being done by PRC and Levine-Fricke. The agency comments on the Draft IR-3 EE/CA were received on May 23, 1996. The Navy will submit the Draft Final IR-03 EE/CA by mid-June. PRC will begin development of the Draft IR-03 IWP once agreement has been reached between the Navy and the agencies on a preferred alternative. A meeting is scheduled in early June between the Navy and the agencies on this issue.

Proposed Repair of the Storm Drains and Removal of Sediments: The preparation of documentation is being done by PRC and IT Corporation. Comments on the Draft Storm Drain EE/CA were received and the Draft Final Storm Drain EE/CA was prepared and submitted for agency review on May 28, 1996. The Draft Storm Drain IWP was prepared and was provided to the agencies on May 21, 1996. Both the Draft Final EE/CA and the IWP covered the reduced scope of the removal which includes only sediment removal. After the sediment removal, storm water monitoring will be performed to determine if any contaminated groundwater is infiltrating into the storm drain system. If groundwater is found to be infiltrating, repair of those conditions will be handled in the final remedial action.

Tank Farm (IR-6) Removal: This work is being performed by Public Works. The Navy submitted to the agencies for review the Draft Tank Farm EE/CA in early December. Agency comments were provided in January. The Navy submitted the Draft Final EE/CA on May 15, 1996. The public comment period for this removal action will begin June 26, 1996.

Sediment Removal at Dry Dock 4: The preparation of documentation is being performed by Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo (SSPORTS). Additional sampling was conducted in February to perform the modified WET tests for bay water exposure. Preliminary results indicate low to non-detected concentrations of most metals. The Navy expects to submit the revised Draft Dry Dock 4 EE/CA in August 1996.

- **Ecological Risk Assessment Phase 1B:** The Draft Preliminary Assessment (PA) Parcel F Report was submitted for review to the agencies on February 22, 1996. The Navy had been awaiting comments from DTSC before finalizing the document. In May, DTSC indicated that it would defer the review to EPA. The Navy will now respond to the EPA comments and submit the Draft Final PA Parcel F Report to the agencies in June. The offshore sampling supporting the Phase 1B Ecological Risk Assessment was completed on February 14, 1996. The chemical and bioassay data validation process for all samples except the tissues has been completed. Anticipated completion of the tissue sample validation process is the middle of June. Presentation and analysis of this data is now being planned.
- **Radiation Issues:** (1) The low-level radioactive waste storage bin in Building 130 was manually ventilated to reduce the radon gas concentration. This is an ongoing monthly activity. (2) The Navy prepared an abbreviated feasibility study to evaluate the alternatives, costs, public perception, and other factors associated with the removal of radium dials in the landfill. This issue is especially problematic because the dials are commingled with organic and inorganic contamination in the landfill. This document was submitted to the regulatory agencies for input on April 30, 1996. (3) The response to agency comments on the Draft Phase III Radiation Investigation Field Work Plan was completed for internal review on April 30, 1996. The Draft Final Phase III Radiation Investigation Field Work Plan will be finalized after agency requests for complete historical documentation have addressed. (4) The Draft Final Results of the Subsurface Radiation Investigation In Parcels B and E Report will be submitted to the agencies in early June 1996. (5) The Navy has prepared a technical memorandum that addresses the tidal area surrounding IR-2. This technical memorandum has undergone the Navy's internal review and will be submitted to the regulatory agencies for review in early June 1996. (6) Meetings were held in January and March to discuss issues regarding the screening and disposal of IDW drums as discussed in earlier progress reports. As a result of these decisions, the number of drums to be screened by the Navy's radiation contractor has undergone a change in scope. The estimated time of completion for the field screening survey is June.
- **Community Relations:** The Draft Revised Community Relations Plan (CRP) was submitted to the agencies for review on February 14, 1996. At the request of the EPA, four additional questionnaires were distributed to community members for inclusion in the draft final CRP. The additional input should allow input from those unavailable earlier, as well as reflect the recently elected City of San Francisco administration. EPA requested an extension of the review period. The delivery of the last set of agencies comments was received on March 29, 1996. The Draft Final Revised CRP is under internal review and will be delivered to the agencies during June.
- **PCB Occurrences:** EPA expressed some concern regarding the widespread occurrence of polychlorinated biphenyls (PCB) at low levels site wide. The Navy is reviewing a response that evaluates locations with PCB concentrations that exceed 1 mg/kg to determine an appropriate response action. This document is being reviewed by the Navy to ensure that any additional work is incorporated in the ongoing remedial investigation, and it will be distributed to the agencies in June 1996.

## 2. REPORTS SUBMITTED AND MEETINGS

### Meetings

- The BCT/remedial project manager meetings took place on May 7 and 21, 1996.
- A RAB meeting was held on May 22, 1996. During this meeting, the Navy provided a presentation on exploratory excavations.
- On May 8, 1996, a meeting was held between the Navy, the agencies, and PRC community relations staff to discuss the upcoming recruitment of new RAB members.
- On May 15, 1996, the Navy and the agencies met for a dry run of the RAB presentation for the feasibility process and the exploratory excavations.
- On May 16, 1996, the Navy and the Environmental Protection Agency (EPA) had a meeting with the San Francisco Police Department to answer questions for the proposed interim lease of Building 606 to their department. The question and answer period covered the EBS and the finding of suitability to lease (FOSL) for the building.

### Submittals

- Draft Final Field Sampling Plan for the Formerly Used Defense Sites (FUDS) was delivered to the agencies on May 7, 1996.
- Draft Final Installation Specific Quality Assurance Project Plan Elements was delivered to the agencies on May 28, 1996.
- Draft Final Phase II Air Sampling Report was submitted on May 29, 1996.
- Final Site-Specific EBS/FOSL for Buildings 274 and 282 was completed on May 31, 1996.
- Parcel A Storm Water Sampling Report was submitted to the agencies on May 10, 1996.
- Draft Exploratory Excavation Action Memorandum was submitted on May 21, 1996.
- Draft Final Storm Drain EE/CA was submitted on May 28, 1996.

## 3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

- **Offsite Access for RI Work:** The Navy completed the drilling and sampling of the four borings near IR-18. The Draft Final Parcel B RI Report will report the findings. The Navy is currently planning the installation of four monitoring wells adjacent to the western boundary of IR-01 in Parcel E. Access via City of San Francisco property is expected to help expedite the completion of these wells.

- **Parcel A FOST:** The Navy will perform a property boundary survey of Parcel A to provide a legal description for the FOST.
- **Agency Requests for Full Radiation Documentation:** The delivery of the Draft Final Phase III Radiation Investigation Field Work Plan has been delayed due to the agency requests for complete historical documentation. The delivery date is pending guidance from RASO and a discussion with the regulatory agencies.
- **Petroleum-only Sites at HPS:** The Navy has started the identification of installation restoration sites within Parcels B through E that contain (a) petroleum-only constituents (non-CERCLA hazardous substances) in soils; (b) petroleum constituents with CERCLA substances in soils below screening levels; (c) CERCLA substances in soils above screening levels; and (d) sites that require no further action. The purpose is to segregate petroleum-only issues from CERCLA issues for administrative purposes, and inclusion of these sites in a corrective action plan.
- **Scope of the Basewide RI Report:** The current FFA lists a deliverable for a Basewide Remedial Investigation Report to accompany the delivery of the Parcel E RI Report. The scope of the Basewide RI is not currently defined. Discussions are underway concerning the need for a Basewide RI/FS/ROD and if its purpose is to address otherwise unresolved datagaps or other issues identified in other activities, or to summarize highlights of prior RI reports or activities such as prior human health risk assessments (HHRA), or to provide a facility-wide HHRA, or to be a road map or reference listing of other RI activities. On May 7, 1996 at a BCT meeting, DTSC indicated an interest in the Navy performing a Basewide HHRA as a separate document or as an appendix to the Parcel E RI Report, and that this Basewide HHRA would serve as the Basewide RI report. DTSC indicated that it would be reasonable to extend the schedule for a Basewide RI report to go beyond the schedule for the appropriate review time period. On May 7, 1996, DTSC indicated an interest in the Navy performing a basewide ROD as a separate document. The purpose of this basewide ROD is unclear since RODs will have been issued for each of the parcels which comprise the facility. The scope of the basewide ROD is not currently defined.

The scope of a basewide RI report and potential basewide ROD are under discussion between the Navy and the BCT and should be included as a topic in upcoming BCT meetings.

- **Hunters Point Shipyard Groundwater Ambient Levels (HGAL):** The Navy is in the process of developing the HGALs, on a basewide basis, for naturally occurring metals that have a maximum contaminant level (MCL), U.S. EPA Region 9 tap water preliminary remediation goal (PRG), or National Ambient Water Quality Criteria (NAWQC). The purpose of establishing HGALs is to have an ambient value for each naturally occurring metal in the HPS A-Aquifer groundwater to compare against detected metals in A-Aquifer groundwater monitoring wells. The Navy is in communication with DTSC to formulate the methodology for the development of the HGALs. Based on these discussions, the Navy will move ahead with the preliminary statistical analysis with the goal of providing the first analysis of the data to DTSC in June.

#### 4. REPORTS AND ACTIVITIES FOR JUNE 1996



### Documents Scheduled for June 1996 Submittal

- Draft Final Parcel B RI Report
- Draft Parcel B Feasibility Study Report
- Draft Final Results of the Subsurface Radiation Investigation In Parcels B and E Report
- Draft Final IR-01/21 Groundwater Removal EE/CA
- Draft Storm Drain Sediment Removal Action Memorandum
- Draft Final IR-03 EE/CA
- Draft Annual OU-II Groundwater Monitoring Report
- Draft IR-1/21 Groundwater Removal Implementation Work Plan
- Draft Final Revised Community Relations Plan
- Draft Final Preliminary Assessment of Parcel F Report
- Draft Final Phase III Radiation Investigation Field Work Plan
- Final Basewide Environmental Baseline Survey Report
- Review of PCB Occurrences in Soil and Groundwater Technical Memorandum
- Draft Parcel A FOST
- Draft Parcel D RI Report

### Activities Planned for June 1996

- **Field Investigations:** Continue with the implementation of the RI field work for all Parcels. Tasks include drilling, surveying, monitoring well installation, management of investigation derived waste and others.
- **Removal actions:** Continue work at Dry Dock 4 and IR-6. Continue with the preparation of the documentation for upcoming removal actions.
- **Survey of Parcel A Boundary:** Parcel A Boundary to be surveyed to provide a legal description for the FOST.
- **Meetings:** Attend scheduled BCT/RPM meetings scheduled for June 4 and June 17, 1996. Attend RAB meeting scheduled for June 26, 1996.

- **Radiation Issues:** Prepare the screening of NRDL sites. Continue the radiation-related waste management activities.
- **RI Reports:** Continue the preparation of the Parcels B, C, D and E RI reports.
- **BCT Activities:** Prepare for the monthly BCT/RPM meeting.
- **CRP Activities:** Present poster session on the Storm Drain Sediment and IR-01/21 Groundwater Removal Action EE/CAs. Also present the results of the feasibility study for Parcel B at the next RAB meeting scheduled on June 26, 1996.

## 5. KEY PERSONNEL CHANGES

- **Navy:** As a result of the transfer of David Song from the Hunters Point Shipyard project to an international assignment with the Army Corps of Engineers, Luann Tetirick has been reassigned to be responsible for the management of Parcel E, the IR-03 removal action, and radiation and community relations issues. Additional responsibilities previously covered by Mr. Song concerning the groundwater removal action at IR-01/21 and the Phase IB Ecological Risk Assessment (Parcel F) will be handled by William Radzevich. Ms. Tetirick's original assignment of Parcel C, Dry Dock 4, and petroleum corrective actions will be assigned to Mr. Song's replacement, who is still to be determined.

## 6. DELIVERABLES STATUS

To provide better information regarding the project activities, this section has been reorganized in this monthly progress report. This listing consists of installation activities organized by parcel, multiparcel (or facility wide), and removal actions, and their associated deliverables and status. Please note that as an entry is completed it will be dropped from subsequent progress reports.

### ACTIVITY/DELIVERABLE

#### PARCEL A REPORTS

- Draft Parcel A Storm Drain Monitoring Report  
Status: Distributed to the BCT, RWQCB, and San Francisco Redevelopment Agency on May 10, 1996.
- Draft Parcel A Finding of Suitability to Transfer  
Status: Preliminary draft to the Navy is due 6/3/96. Scheduled submittal to agencies on 6/24/96

#### PARCEL B REPORTS

- Draft Final Parcel B Remedial Investigation Report  
Status: Scheduled submittal to agencies on 6/3/96. Agency review period is 30 days.
- Draft Parcel B Feasibility Study Report

Status: **Scheduled** submittal to agencies on 6/3/96. Agency review period is 30 days.

#### PARCEL C REPORTS

- Draft Parcel C RI Report  
Status: **Scheduled** submittal to agencies on 11/30/96. Agency review period is 45 days. **Currently** undergoing data interpretation.

#### PARCEL D REPORTS

- Draft Parcel D RI Report  
Status: **Scheduled** submittal to agencies on 6/28/96. Agency review period is 45 days.

#### PARCEL E REPORTS

- Draft Final FUDs Work Plan  
Status: **Submitted** to agencies on 5/8/96. Work is scheduled to take place during June 1996 **pending** comments on the work plan.
- Draft Radiation Investigation of the Tidal Area Surrounding the Bay Area Landfill (IR-02) Technical Memorandum  
Status: **Currently** being reviewed by RASO prior to submittal to the agencies.
- Draft Parcel E RI Report  
Status: **Scheduled** submittal to agencies on 4/29/97. Agency review period is 45 days. **Currently** performing quality control of the Parcel E database.

#### PARCEL F REPORTS

- Draft Final Preliminary Assessment Parcel F  
Status: **Expected** to be delivered to the agencies in June 1996.
- Draft Phase 1B Ecological Risk Assessment Report  
Status: **Scheduled** to be submitted to agencies on 8/1/96. **Currently** undergoing data interpretation.

#### MULTIPARCEL/FACILITY-WIDE INVESTIGATION REPORTS

- Draft Final Results of Subsurface Radiation Investigation on Parcels B and E  
Status: **Responses** to comments on the draft document are being prepared. The revised document will be submitted during June.
- Draft Final Phase III Radiation Investigation Field Work Plan  
Status: **Submittal** due to the Navy was 4/26/96; however due to agency requests for complete historical documentation, the delivery has been delayed pending guidance from RASO and discussion with the regulatory agencies.
- Draft Annual OU II Groundwater Monitoring Report

Status: Undergoing internal Navy review and expected completion during June 1996.

- Draft Final Phase II Air Monitoring Report and Work Plan  
Status: The draft final report and work plan were submitted concurrently on May 29, 1996.
- Draft Final Revised Community Relations Plan  
Status: Currently in internal review and will be delivered to the agencies in early June 1996.
- Final Basewide Environmental Baseline Survey  
Status: Final will be submitted to the agencies on 6/3/96. Draft final report not issued; only response to agencies comments on 4/28/96. Agencies accepted draft final responses.
- Draft Final Facility-Wide Groundwater Monitoring Plan  
Status: Submitted on 4/26/96. DTSC provided comments which will be resolved prior to plan implementation.
- Draft Study of Groundwater Sampling Methods for Metals Technical Memorandum  
Status: Distributed to the agencies in May and currently awaiting comments.
- Draft Review of PCB Occurrences in Soil and Groundwater Technical Memorandum  
Status: Submittal to the agencies is expected in June.
- Draft Final Installation-Specific Quality Assurance Project Plan Elements  
Status: Submitted to the agencies on 5/28/96.

## REMOVAL ACTIONS

- Draft Final Exploratory Excavation EE/CA  
Status: The Draft Action Memorandum was submitted for agency review on 5/21/96. Draft Responsiveness Summary was submitted for Navy review on 4/24/96 and was incorporated into the Action Memorandum.
- Draft Final IR-1/21 Groundwater Removal EE/CA  
Status: To be submitted to the agencies in early June.
- Draft Final IR-3 Floating Product Removal EE/CA  
Status: Anticipated submittal by mid-June 1996.
- Draft Final Storm Drain Sediment Removal EE/CA  
Status: Draft Final EE/CA was submitted to the agencies on May 28, 1996.
- Draft Construction Summary Report of Pickling and Plate Yard Removal Action  
Status: Due 90 days after completion of the removal action. Draft report is due in July 1996.

During the month of April Hunters Point Annex (HPA) became officially Hunters  
Point Shipyard (HPS)

*Richard E. Powell*

RICHARD POWELL  
LEAD REMEDIAL PROJECT MANAGER

*6-17-96*

DATE